

Item 11
For Approval and Endorsement

Glasgow Kelvin College

Audit and Risk Committee Meeting of 25 November 2025

Policies

Report by Director of Estates and Corporate Services

1. Introduction

As members will be aware, and in line with the review schedule, the following policies are due for review:

- Anti-Fraud and Anti-Corruption Policy
- Anti-Bribery Policy/Statement
- Gifts and Hospitality Policy
- Public Interest Disclosure (Whistleblowing) Statement of College Policy

Copies attached at **Appendices 1-4.**

2. Changes to Policies

2.1 Anti-Fraud and Anti-Corruption Policy

The College's Anti-Fraud and Anti-Corruption Policy has been extensively updated as per the Henderson Loggie audit recommendations below:

Audit Report	Audit Reference	Original Recommendation	Priority	Management Response	Agreed	To Be Actioned by	No Later Than	Progress	High Priority	Medium Priority	Low Priority	Considered Complete by Owner
Fraud Prevention, Detection and Response		the College should take steps to update its Anti-Fraud & Anti Corruption Policy and Anti Bribery Policy Statement to ensure alignment with the Money Laundering Policies and Procedures to ensure that staff are equipped with knowledge required to meet the duties placed upon the College as set out in the 2011, Money Laundering Act, Terrorist Financing and Transfer of Funds Regulation 2017 (and the 2022 update).	3	Henderson Loggie could provide example wording, this would be appreciated.	Yes	L Clark	30 November 2025	Update as at November 2025 The College received some advice from Henderson Loggie in regard to the items that should be contained within such Policies. Extensive work has taken place to fully update these policies and the Head of Finance has also been involved in reviewing these documents and related procedures. These policies are on the Audit and Risk Committee agenda for 25 November 2025.			1	Yes
Fraud Prevention, Detection and Response	2025/03	R2 – The College should develop and implement a documented approach for all future potential fraud investigations to ensure that they are undertaken in a consistent way which ensures, fairness, independence, and provides sufficient documentation and evidence for further investigation by any external body (such as a professional body).	3	This recommendation is accepted. If Henderson Loggie could provide any example approaches, this would be appreciated.	Yes	J Evans	30 November 2025	Update as at November 2025 As above, the College reviewed advice received from Henderson Loggie in regard to the documented approaches required. Attached to the Anti-Fraud and Anti-Corruption Policy are the procedures that are laid out in a consistent manner and covers requirements in this audit recommendation. These procedures are contained within the Policies paper on the Audit and Risk Committee agenda for 25 November 2025.			1	Yes

The Director of Estates and Corporate Services and the Head of Finance have gone over this Policy and related procedures in detail and are content that it meets audit requirements.

This fully updated and amended Policy complete with documented processes as requested by Henderson Loggie is available as per **Appendix 1** to this paper on the portal. All changes made are detailed in blue text.

2.2 Anti-Bribery Policy/Statement

The Director of Estates and Corporate Services and the Secretary to the Board of Management have reviewed this Policy in detail. The changes are minor in nature.

All changes made are detailed in [blue](#) text.

The updated Anti-Bribery Policy/Statement is available as per **Appendix 2** to this paper on the portal.

2.3 Gifts and Hospitality Policy

The Gifts and Hospitality Policy has been read through in detail by the Director of Estates and Corporate Services and the Secretary to the Board of Management and minor updates have been made.

All changes made are detailed in [blue](#) text.

The updated Gifts and Hospitality Policy is available as per **Appendix 3** to this paper on the portal.

2.4 Public Interest Disclosure (Whistleblowing) Statement of College Policy

The Public Interest Disclosure (Whistleblowing) Statement of College Policy has been read through in detail by the Director of Estates and Corporate Services and the Secretary to the Board of Management and minor updates have been made.

All changes made are detailed in [blue](#) text.

The updated Public Interest Disclosure (Whistleblowing) Statement of College Policy is available as per **Appendix 4** to this paper on the portal.

2.5 Further Review

All policies have been reviewed and approved by the Senior Leadership Team and it was agreed that the College would develop appropriate materials to update staff and stakeholders on these important policies.

The Committee is asked to endorse the Anti-Fraud and Anti-Corruption Policy (as there have been material changes) and also endorse the Gifts and Hospitality Policy and the Public Interest Disclosure (Whistleblowing) Statement of College Policy, which will go to the Board for approval as per the policy schedule, and to approve the Anti-Bribery Policy/Statement.

3. Resource Implications

There are no real resource implications involved in terms of reviewing these governing documents.

4. Impact on Students

There are no negative impact on students identified as a consequence of anything within this report or the routine review of these policies.

5. Equalities

No adverse impacts on individuals with protected characteristics have been identified as a consequence of this report. Equality Impact Assessments for these policies have been refreshed and are available upon request.

6. Risk and Assurance

Risk to the College is mitigated by ensuring that appropriate governing documents are in place and that the Board of Management receive the necessary assurances that these are being reviewed within the governing framework.

7. Data Protection

There are no data protection implications arising as a consequence of this report.

8. Environmental and Sustainability

There are no new environmental and sustainability matters arising from the contents of this report.

9. Recommendations

It is recommended that members:

- i) note the contents of this report; and
- ii) endorse the Anti-Fraud and Anti-Corruption Policy as contained in Appendix 1, which will then go to the Board for approval;
- iii) approve the Anti-Bribery Policy/Statement as contained in Appendix 2;
- iv) endorse the Gifts and Hospitality Policy as contained in Appendix 3;
- v) endorse the Public Interest Disclosure (Whistleblowing) Statement of College Policy as contained in Appendix 4.

10. Further Information

Further information can be obtained from Lisa Clark, Director of Estates and Corporate Services on lisaclark@glasgowkelvin.ac.uk, Heather Jackson, Secretary to the Board of Management at hjackson@glasgowkelvin.ac.uk or Alan Carr, Head of Finance at acarr@glasgowkelvin.ac.uk

Lisa Clark
Director of Estates and Corporate Services
November 2025